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Food Safety And Inspection Service
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AUDIT REPORT FOR BELGIUM
FEBRUARY 27 THROUGH MARCH 8, 2002

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Belgium's meat inspection system from February 27 through March 8, 2002. Both establishments (B-45 and B-156) certified to export meat to the United States were audited. Each was conducting processing operations.

The last audit of the Belgian meat inspection system was conducted in August 2001. All seven establishments were audited: two were acceptable (B-156 and B-477), one was certified as acceptable/re-review (B-45), and four were unacceptable (EEG-93, EEG-93-1, CEE-135, and B-6) and delisted. HACCP-implementation was deficient in six of the seven establishments visited. Belgian officials voluntarily delisted Establishment B-477 on February 7, 2002.

The major concerns from the previous audit were the following.

- The continuing problems with the implementation and maintenance of Sanitation Standard Operating Procedures (SSOPs) in certified establishments.
- The continuing problems with implementation and maintenance of Hazard Analysis Critical Control Point (HACCP) systems in certified establishments.
- Instances of actual product contamination and instances of the potential for direct product contamination.
- Inadequate inspection system controls, including the identification of containers for edible and inedible product, enforcement of the zero-tolerance for visible fecal material/ingesta contamination, and milk on carcasses, and species verification testing program.
- The lack of adequate daily inspection coverage in establishments producing products for export to the U.S.
- The lack of periodic supervisory reviews of certified establishments.
- The lack of daily inspection coverage for second and third shift operations in processing establishments.

During calendar year 2001,Belgian establishments exported 7,118,424 million pounds of cured pork and canned hams to the U.S. Port-of-entry (POE) rejections were for composition/standards (0.02%) and transportation damage (0.03%).

Belgium only exports processed pork products to the United States. Restrictions are placed upon Belgian fresh pork and beef due to the presence of hog cholera and Bovine Spongiform Encephalopathy (BSE).

PROTOCOL

This on-site audit was conducted in three parts. One part involved visits with Belgian national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second consisted of on-site review of both establishments certified to export to the United States. The third was an audit of the national laboratory that conducts the analytical testing of field samples for the national residue-testing program, and cultures field samples for the presence of microbiological contamination with *Salmonella*

Belgium's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems, and (5) enforcement controls.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in the two establishments audited, but the SSOP and HACCP plans did not adequately address the applicable regulatory requirements for their implementation. The establishments are being allowed to continue to operate, but must correct all deficiencies within 30 days. If the establishments do not correct the deficiencies, the Government of Belgium (GOB) must withdraw their certification to export products to the United States. GOB inspection officials must verify full compliance and notify FSIS in writing of their findings. Details of the audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

As stated above, numerous major concerns had been identified during the last audit of the Belgian meat inspection system, which was conducted in August 2001. During this new audit, the auditors determined that some of these major concerns had been addressed and corrected by the Belgian Ministry of Public Health (MPH). However, the following deficiencies identified in the August 2001 audit had not been corrected:

1. The continuing problems with the implementation and maintenance of SSOP in certified establishments. (Repeat deficiency in both establishments.)
2. The continuing problems with implementation and maintenance of HACCP systems in certified establishments. (Repeat deficiency in one establishment.)
3. Instances of actual product contamination and instances of the potential for direct product contamination. (Repeat deficiency in one establishment.)

During this new audit, the following deficiencies related to implementation of the required HACCP programs were found in both establishments visited:

1. Continuing problems with the implementation and maintenance of SSOP.
2. Continuing problems with implementation and maintenance of HACCP systems.
3. Instances of actual product contamination and instances of the potential for direct product contamination.
4. On-going verification activities of the HACCP program were not adequately performed by the GOB meat inspection officials.
5. GOB meat inspection officials were not adequately monitoring/verifying the adequacy and effectiveness of the pre-operational and operational sanitation SSOP.

Additional details are provided in the Slaughter/ Processing Controls section later in this report.

Entrance Meeting

On February 27, an entrance meeting was held with Belgian government officials at the Brussels office of the Institute for Veterinary Inspection (IVI), Federal Agency for Food Safety, Federal Ministry of Public Health, Consumer and Social Affairs (MPH). The participants from Belgium were Dr. Joel Gustin, Director of the Quality Service, Animal Products; Dr. Nelly Vermeeren, International Relations Service; Dr. Yves Renodeyn, Quality Service; Dr. A. Van Brempt, Director of Gent District; Dr. W. Dendas, Director of Hasselt Director; Dr. E. Versele, HACCP auditor Quality Service; Dr. J. Delathouwer, HACCP auditor for Hasselt District; Dr. N. Van Der Stede, HACCP auditor for Gent District; Dr. Edith Vanhese, Officer in Charge Hasselt District; Dr. Marc Riebbels, Officer in Charge Gent District; Dr. Griet de Smedt, Headquarter; Dr. Frank Swartenbroux, Federal Agency for Food Safety.

The United States government participants were Mr. Yvan Polet, Agricultural Specialist, Foreign Agriculture Service (FAS) American Embassy in Brussels; Ms. Marie-France Rogge, Agricultural Assistant, FAS, American Embassy in Brussels; Mr. Gary E. Stefan, Equivalence Officer, International Policy Staff, Office of Policy, Program Development and Evaluation (OPPDE), Food Safety and Inspection Service (FSIS); and Dr. Faiz R. Choudry, International Audit Staff Officer, Technical Service Center (TSC), FSIS.

Topics of discussion included the following:

1. Welcome by Dr. J. Gustin, Director of Quality Service and explanation of the Belgian meat inspection system.
2. Training programs for Belgium's veterinary meat inspection officials for pathogen reduction and other food safety initiatives such as SSOPs and HACCP programs.
3. The auditor provided a) FSIS Notice, Reassessment of *Listeria monocytogenes* contamination of Ready-to-Eat Products (RTE). b) FSIS Notice-12-98, Notification to Establishments of Intended Enforcement Actions.
4. Discussion of the previous audit report.
5. The audit itinerary and travel arrangements.

Headquarters Audit

Since the last U.S. audit of Belgium's inspection system in August 2000, Dr. Marc Cornelis has been appointed as Chief Veterinary Officer, replacing Dr. Roger Francaux who retired. There had been no changes in the organizational structure of the inspection system

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

Both establishments certified to export meat to the United States were audited on-site; therefore, a record review was not conducted at the Institute for Veterinary Inspection or at a district office.

Government Oversight

Belgium has a well-organized national inspection system for meat, poultry and fisheries products that is managed by the Institute for Veterinary Inspection (IVI). The IVI is a part of the Federal Agency for Food Safety that, in turn, is under the Federal Ministry of Public Health. Within IVI there is a general services department that has responsibility for administrative functions (personnel, budget, etc.) and the inspection department that has responsibility for implementing the inspection activities. The inspection department consists of a central board consisting of a Veterinary Policy Section and a Veterinary Control Section; seven regional districts; and two national districts (special duty services).

The Veterinary Policy Section has three departments: (1) residues and contamination; (2) microbiology; and (3) export and import. The Veterinary Control Section also has three departments: (1) red meat and meat products; (2) poultry and poultry products; and (3) fish and fishery products.

The seven regional districts all have a similar organizational structure consisting of the district director, two or more adjutant directors, a core staff of full time official veterinary inspectors and a larger staff of part time independent veterinarians who carry out the bulk of the in-plant inspection activities. The full time official veterinary inspectors are under the direct supervision of the district director and, in turn, provide supervisory oversight for the part time independent veterinarians.

All inspection veterinarians and inspectors in establishments certified by Belgium as eligible to export meat products to the United States were full or part-time employees of the Ministry of Health, receiving no remuneration from either industry or establishment personnel.

The two national districts are actually two staffs with national program responsibilities. One has responsibility for implementing the national residue control program and investigating economic fraud cases. The second staff has responsibility for conducting quality assurance assessments of specific national programs.

Level of Staffing

The Veterinary Policy Section has nine veterinarians and the Veterinary Control Staff has 11. There are two vacant deputy manager positions currently at the IVI. Staffing in the district offices is based upon the number of establishments subject to inspection, the volume of production within each establishment and the geographic distribution of the establishments within the district. A typical district will have 10-12 full time official veterinarians and 75 or more part time independent veterinary inspectors.

Training

All government inspectors in meat and poultry slaughter and processing establishments must be veterinarians. Nearly all training of newly hired veterinarians is obtained via on-the-job training. Throughout the year there are several ½ to one-day seminars on specialized topics related to inspection and public health which veterinary inspectors are encouraged to attend.

HACCP training was provided to staff three years ago. Following identification of HACCP discrepancies during the FY2001 audit, additional guidance (Specific Instruction Export U.S.) was developed and distributed in January 2002 to inspection staff in districts with establishments certified to export to the United States. However, there still appears to be an inadequate understanding of U.S. requirements for SSOPs and PR/HACCP by both government inspectors and establishment personnel.

Management Oversight

Lines of authority are clearly delineated from the Director of the Institute for Veterinary Inspection through the regional district director down to the official veterinarians and part time independent veterinarians. An efficient system exists for preparing and disseminating information on program activities, regulatory requirements, etc., to all staff at all levels. Managers have frequent, regularly scheduled meetings with subordinates to relay information and discuss program activities. Minutes of most of these meetings are prepared and distributed to attendees.

There are no clearly defined descriptions of the duties of the full time veterinary or the part time independent veterinary inspectors.

Strong controls are not in place to verify that program responsibilities and objectives have been properly implemented. Other than monthly reports of inspection time which are used for calculating inspection fees to be charged to establishments, reporting of inspection program activity by each region is not done uniformly. There is no independent, internal audit structure. One source of feedback is audits by the European Commission and importing countries such as the United States.

Full time government veterinarians are prohibited from working at outside jobs. A waiver can be requested for special situations such as teaching a course at an educational institution. Part time, independent veterinarians are not permitted to be an employee of the establishment where they are serving as a government inspector or to inspect animals from farms of their clients. They may work at establishments other than those where they work as a government inspector.

The process used for evaluating the performance of individual veterinarians is under a legal challenge. At this time, few if any evaluations are being conducted. The usual time frame for individual evaluations was once every two years.

Establishment Audits

Two establishments were certified to export meat products to the United States at the time this audit was conducted and both establishments were visited for on-site audits. The auditor found serious deficiencies involving inadequate HACCP implementation in both establishments. The establishments are being allowed to continue to operate, but must correct all deficiencies within 30 days. GOB inspection officials must verify that the establishments are in full compliance with all U.S. requirements.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories; intra-laboratory quality assurance procedures, including sample handling, and methodology.

Belgium conducts its residue and domestic microbiological testing for *Salmonella, E. coli*, and *Listeria monocytogenes* at the Scientific Institute of Public Health-Louis Pasteur, Ministry of Social Affairs, Public Health and Environment, a government laboratory located in Brussels. The audit took place on March 1, 2002. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, corrective actions, and intra-laboratory and inter-laboratory check sample programs. The methods used for the analyses were acceptable. No compositing of samples was done (this was not a deficiency).

The Belgian Ministry of Economic Affairs Accreditation Department accredited the laboratory on December 15, 2000.

Establishment Operations by Establishment Number

The following operations were being conducted in the two establishments:

Beef, pork, chicken, and turkey cooked sausages and cooked hams and canning-Establishment B-156.
Pork boning curing, cooking, smoking and canning - Establishment B-45.

SANITATION CONTROLS

Based on the on-site audits of establishments, Belgium's inspection system had controls in place for water potability records; chlorination procedures; back-siphonage prevention; hand washing facilities; separation of operation; pest control program; temperature control; lighting; operation work space; ventilation; outside premises; over-product ceilings; over-product equipment; product contact equipment; dry storage areas; welfare facilities; personal dress and habits; product handling and storage; product reconditioning; and product transportation.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

In both establishments, GOB meat inspection officials were not adequately monitoring/verifying the adequacy and effectiveness of the pre-operational and operational sanitation SSOP. Inspectors were performing pre-operational and operational sanitation SSOP with a variable frequency such as once a week, and between two to four times a month. The daily pre-operational and operational sanitation deficiencies were not identified and the GOB inspection officials did not adequately document the corrective actions taken. (Repeat deficiency in both establishments from the last audit.)

Cross-Contamination

Actual product contamination and the potential for product contamination was found in one of the two establishments audited. Establishment officials took corrective actions immediately. Specific findings for each establishment audited on-site can be found in Attachment F.

1. In one establishment (B-156), the sanitizing facility for knives in the processing room was designed in such a way that it was not possible to sanitize knives completely and effectively. Establishment official agreed to correct the problem. (Repeat deficiency from last audit)

2. In one establishment (B-156), an employee was picking up unclean wrapping material from the floor, cutting plastic wrapping with a knife and, without washing hands and washing/sanitizing his knife, handling edible product. Establishment officials took corrective action immediately.

ANIMAL DISEASE CONTROLS

Belgium does not have any slaughter establishments that are certified to export product to the United States, so these risk factors were not evaluated.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Belgium's National Residue Testing Plan for 2002 was being followed, and was on schedule. The Belgian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The Belgian inspection system had controls in place to ensure adequate ingredients identification; control of restricted ingredients; formulations; packaging materials; label approvals; inspector monitoring; processing equipment; processing records; empty can inspection; filling procedures; container closure examination; and post-processing handling.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were reviewed during the on-site audits of both establishments. The auditor found the following deviations from FSIS regulatory requirements:

1. In both establishments, the HACCP plans did not include all food safety hazards likely to occur. (Repeat deficiency in Establishment B-45 from last audit.)

2. In both establishments, the HACCP plan did not specify critical limits adequately for each CCP and the frequency with which these CCPs would be monitored. (Repeat deficiency in Establishment B-45 from last audit.)

3. In Establishment B-45, the HACCP plan did not address adequately the corrective actions to be followed in response to a deviation from a critical limit. (Repeat deficiency from last audit.)

4. In both establishments, the HACCP plan was not validated to determine that it was functioning as intended. (Repeat deficiency in Establishment B-45 from last audit.)

5. In both establishments, the HACCP plan did not state adequately the procedures that the establishment would use to verify that the plan was being effectively implemented and the frequencies with which these procedures would be performed. The on-going verification activities of the HACCP program were not performed adequately by the establishment personnel. (Repeat deficiency in Establishment B-45 from last audit.)

6. In both establishments, the HACCP plan's record-keeping system was not adequately documenting the monitoring of CCPs. (Repeat deficiency in Establishment B-45 from last audit.)

Testing for Generic *E. coli*

E. coli testing is not required in Belgium's establishments that are certified to export meat products to the United States because the Animal and Plant Health Inspection Service regulations prohibit the importation of meat from hogs and cattle slaughtered in Belgium. Belgium obtains meat for export from hogs and cattle slaughtered in a third country eligible to export meat to the United States.

Additionally, establishments had adequate controls in place to prevent meat products intended for Belgian domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

The Belgian inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat re-inspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in

ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Salmonella testing is not required in Belgium's establishments that are certified to export meat products to the United States because the Animal and Plant Health Inspection Service regulations prohibit the importation of meat from hogs and cattle slaughtered in Belgium. Belgium obtains meat for U.S. export products from hogs and cattle slaughtered in a third country eligible to export meat to the United States.

Species Verification Testing

At the time of this audit, Belgium was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Monthly Reviews

The internal review program was applied equally to both export and non-export establishments. Internal review visits were not announced in advance and were conducted, at times by individuals and at other times by a team of reviewers, monthly. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the Keurkring LVLB (District Office) MPH offices, and were routinely maintained on file for a minimum of 3 years.

Enforcement Activities

Controls were in place to ensure adequate export product identification, inspector verification, export certification, a single standard of control throughout the establishment, and adequate controls for security items, shipment security, and product entering the establishments from outside sources.

The domestic and exporting country requirements are enforced by MPH, which has full power to initiate all enforcement actions.

Exit Meeting

An exit meeting was conducted in Brussels at the Institute for Veterinary Inspection on March 7, 2002. The participants from Belgium were Dr. Marc Cornelis, Director, IVI, MPH; Dr. Nelly Vermeeren, International Relations Service; Dr. A. Van Brempt, Director of Gent District; Dr. W. Dendas, Director of Hasselt Director; Dr. E. Versele, HACCP auditor

Quality Service; Dr. J. Delathouwer, HACCP auditor for Hasselt District; Dr. N. Van Der Stede, HACCP auditor for Gent District; Dr. Edith Vanhese, Officer in Charge Hasselt District; Dr. Marc Riebbels, Officer in Charge Gent District; Dr. Griet de Smedt, Headquarter; Dr. Frank Swartenbroux, Federal Agency for Food Safety; Dr Carlos Van Dunbrae, HQ, Compliance; and Dr. Sofie Huyberechts, Veterinary Officer, IVK.

The United States government participants were Dr. Faizur R. Choudry, International Audit Staff Officer, TSC, FSIS; Mr. Gary E. Stefan, Equivalence Staff officer, OPPDE, FSIS; Mr. Yvan Polet, Agricultural Specialist, FAS, United States Embassy in Brussels; and Mr. Philip Letarte, Agricultural Counselor, American Embassy in The Hague.

A second meeting was conducted with the European Commission (EC) in Brussels, Belgium on March 8, 2002. The EC participant was Dr. Paolo Dhostby, DG, Health and Consumer Protection Directorate General (SANCO), Unit E-3. The Belgian government participant was Dr. Sofie Huyberechts, Veterinary Officer, IVK. The participants from the United States were Ms. Sally Stratmoen, Chief, Equivalence, International Policy Staff, FSIS per telephone; Dr. Faizur R. Choudry, International Audit Staff Officer, FSIS; Mr. Gary E. Stefan, Equivalence Officer, International Policy Staff, OPPDE, FSIS; and Ms. Caroline Hommez, Agricultural Specialist, United States Mission to the European Union, Foreign Agricultural Service, Brussels.

The following topics were discussed:

1. The continuing problems with the implementation and maintenance of SSOP in certified establishments.
2. The continuing problems with implementation and maintenance of HACCP systems in certified establishments.
3. One instance of actual product contamination and one instance of the potential for direct product contamination in one establishment.
4. In both establishments, the ongoing verification activities of the HACCP program were not performed adequately by the GOB meat inspection officials.
5. In both establishments, GOB meat inspection officials were not adequately monitoring/verifying the adequacy and effectiveness of the pre-operational and operational sanitation SSOP.

The auditor explained to the GOB inspection officials that Belgian meat inspection system was audited in accordance with the European Union/United States Veterinary Equivalence Agreement using 1) Council Directive 64/433/EEC of June 1964. Health Problems Affecting Intra-Community Trade In Fresh Meat; 2) Council Directive 96/23/EC of April 29, 1996: Measures To Monitor Certain Substances And Residues Thereof In Live Animals And Animal Products; and 3) Council Directive 96/22/EC of April 29, 1996: Prohibition On The Use In Stockfarming Of Certain Substances Having A Hormonal Or Thyrostatic Action And B-Agonists. These three directives have been declared equivalent under the Agreement. In areas not covered by these directives, the auditor used FSIS requirements and equivalence determinations such as the Pathogen Reduction/HACCP Final Rule including regulations on SSOP, *E. coli* testing and *Salmonella* performance standards.

Dr. Marc Cornelis, Chief Veterinary Officer, Institute for Veterinary Inspection (IVI), Federal Agency for Food Safety (FAFA), Federal Ministry of Public Health (FMPH), stated that he would take the necessary steps to ensure that corrective actions and preventive measures, including HACCP, SSOP, and sanitation problems as promised during the audits and exit meetings in the individual establishments would be implemented.

CONCLUSION

Despite the fact that many of the deficiencies identified during this audit have been previously reported, Belgian meat inspection system veterinarians still are not satisfactorily monitoring and verifying the adequacy and effectiveness of the U.S. pre-operational and operational SSOPs and HACCP requirements. Some improvements have been made in establishment maintenance and SSOP programs, but more progress needs to be made. GOB meat inspection officials reinforced the assurances made by the field personnel during and at the conclusions of the on-site audits of the establishments, and stated that they would ensure prompt compliance.

Dr. Faizur R. Choudry
International Audit Staff Officer

(signed) Dr. Faizur R. Choudry

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing.
D. Data collection instrument for *Salmonella* testing
E. Laboratory Audit Form
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. Sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
B-45	√	√	√	√	√	√	NO	√
B-156	√	√	√	√	√	√	NO	√

NO = Establishment met FSIS basic regulatory requirements of SSOP programs. However, the SSOP plan(s) did not address adequately the applicable regulatory requirements for implementation.

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing and documenting pre-shipment document reviews as required.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Haz. analysis –all ID'ed	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. Reviews
B-45	√	No	√	√	√	No	No	No	No	No	√	√
B-156	√	No	√	√	√	No	√	No	No	No	√	√

No = Establishment met FSIS basic regulatory requirements of HACCP programs. However, the HACCP plan(s) did not address adequately the applicable regulatory requirements for implementation.

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

E. coli testing is not required in Belgium's establishments that are certified to export meat products to the United States because the Animal and Plant Health Inspection Service regulations prohibit the importation of meat from hogs and cattle slaughtered in Belgium. Belgium obtains meat for export from hogs and cattle slaughtered in a third country eligible to export meat to the United States.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
B-45	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
B-156	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

Salmonella testing is not required in Belgium's establishments that are certified to export meat products to the United States because the Animal and Plant Health Inspection Service regulations prohibit the importation of meat from hogs and cattle slaughtered in Belgium. Belgium obtains meat for export from hogs and cattle slaughtered in a third country eligible to export meat to the United States.

Est. #	1. Testing as required	2. Carcasses are sampled	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
B-45	N/A	N/A	N/A	N/A	N/A	N/A
B-156	N/A	N/A	N/A	N/A	N/A	N/A